

United States District Court

JUN 17 2015

SOUTHERNDISTRICT OF
McALLEN DIVISIONTEXAS

David J. Bradley, Clerk

UNITED STATES OF AMERICA
v.

CRIMINAL COMPLAINT

Luis Celedonio-Santiago

A094 792 273

YOB: 1972

Principal
Mexico

Case Number:

M-15- 0988 -M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about June 15, 2015 in Hidalgo County, in the Southern District of Texas defendants(s) did,

(Track Statutory Language of Offense)
knowing or in reckless disregard of the fact that Gualberto Valenzuela-Orantes, a citizen of Guatemala, and Kevin Ramon Carrasco-Muller, a citizen of Nicaragua, along with fifteen (15) other undocumented aliens, for a total of seventeen (17), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) **FELONY**
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On June 15, 2015, Border Patrol Agents arrested a woman after she was stopped by the Palmview Police Department near Inspiration Rd and FM 495 in Mission, Texas. The woman, who claimed to be illegally in the United States, provided information regarding alien smuggling activities at 36935 W. Mile 8 Rd., in Mission, Texas. She told agents that her common law husband had just travelled to 36935 W. Mile 8 Rd., to drop off an illegal alien. She also stated the man who was in charge of that location was named Luis SANTIAGO.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

*Approved
Joseph Leonard* Yes No

Signature of Complainant

Derek Conrow Senior Patrol Agent

Printed Name of Complainant

McAllen, Texas

City and State



Signature of Judicial Officer

Sworn to before me and subscribed in my presence,

June 17, 2015

Date

9:02 pm

at

Peter E. Ormsby, U. S. Magistrate Judge
Name and Title of Judicial Officer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS

ATTACHMENT TO CRIMINAL COMPLAINT:

M-15- 0988 -M

RE: Luis Celedonio-Santiago

A094 792 273

CONTINUATION:

Later, at approximately 10:30 am, agents conducted surveillance on 36935 W. Mile 8 Rd., in Mission, Texas. Agents observed a blue Nissan/Datsun truck exiting the residence and followed it. Deputy Constable Sgt. D. Sanchez conducted a vehicle stop for failing to signal before turning. During the vehicle stop, Sgt. Sanchez noticed that the driver repeatedly put his hands in his pockets, despite orders to keep his hands visible. The driver appeared to Sgt. Sanchez as though he was possibly searching for a way to abscond, by incessantly looking around and avoiding eye contact. The driver initially told the Sargent his name was Julian, but when he surrendered his Mexican Driver's License, his license indicated his name was Luis CELEDONIO-Santiago.

During the traffic stop, agents arrived and interviewed CELEDONIO. CELEDONIO admitted to being in the United States illegally. Agents read CELEDONIO his rights and he stated he would speak to them without the presence of an attorney. CELEDONIO told agents 36935 W. Mile 8 Rd. in Mission, Texas belonged to him, and granted them consent to search the property.

At the vehicle stop, agents found \$700 (USD) and a wire transfer receipt for \$700 from Honduras on CELEDONIO'S person. There were 6 UDAs from Hondurans later found at the trailer.

Also at the vehicle stop, CELEDONIO told agents the money was to buy tools. At the station, in his sworn statement, he told agents that the woman that is named on the receipt asked him to pick up the cash and take it to the man who was renting CELEDONIO'S house.

Later, in a material witness's statement, agents would find out that CELEDONIO was requesting the alien's family wire him money.

Agents travelled to the property and entered residence. Inside, agents found 13 undocumented aliens. There was no functioning air conditioning, and the aliens appeared generally healthy but dehydrated.

An additional 4 undocumented aliens were found in a storage room behind the trailer, on the same property. All 17 undocumented aliens were transported to the McAllen Border Patrol Station for processing.

PRINCIPAL'S STATEMENT:

Luis CELEDONIO-Santiago was read his rights at the vehicle stop. He stated he was willing to provide a statement and did at the station, under oath.

CELEDONIO, a citizen of Mexico, told agents he hasn't lived at the property for 2 months, because he has been renting it out to a man who he was unable to name. CELEDONIO stated he was also supposed to buy some food for the aliens with the money that was wired to him. CELEDONIO then became uncooperative and told agents, he was going to jail anyway, and he did not have anything else to say.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-15- 0988 -M

RE: Luis Celedonio-Santiago A094 792 273

CONTINUATION:

MATERIAL WITNESSES' STATEMENTS:

Both material witnesses were read their rights. Both stated they were willing to provide statements without the presence of an attorney.

1- Gualberto Valenzuela-Orantes, a citizen of Guatemala, claimed to have been charged \$2,000 (USD) to be smuggled into the United States. After illegally crossing the Rio Grande River, he was picked up and transported to the trailer where he was arrested. At the trailer, there was one person in charge. Valenzuela identified CELEDONIO in a photo lineup as the caretaker of the smuggled aliens at the trailer. According to Valenzuela, CELEDONIO ordered the smuggled aliens to stay inside the trailer at all times. CELEDONIO was also the one who would occasionally bring food for them to eat.

2- Kevin Ramon Carrasco-Muller, a citizen of Nicaragua, stated he was charged \$3,000 (USD) to be smuggled into the United States. After illegally crossing the river, Carrasco was taken to 2 different stash houses. At the second house, which is the house where he was arrested, a man showed up and wrote down everyone's names that were staying there. Carrasco identified CELEDONIO in a photo lineup as that man. Additionally, CELEDONIO told the people staying there to find a spot on the floor to sleep. According to Carrasco, CELEDONIO also gave the smuggled aliens his name so they could contact their families and have them wire him money. Carrasco's family wired CELEDONIO \$150 (USD).

CELEDONIO also told the females in the group to cook for the rest. CELEDONIO would occasionally take the smuggled alien's money to buy them food, but always seemed to charge them a lot and never returned with any change.